

July 25, 2000

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, Maryland 20852

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Dear Sir or Madam:

We am writing to express my concerns regarding FDA's recent issuance of a final rule ***Irradiation In The Production, Processing, and Handling of Food***, 65 FR 45280, July 21, 2000.

We are concerned that FDA may be taking the wrong approach in "tackling" the problem of food-borne disease (i.e., salmonella) in eggs. As is well known, there are many problems with the current practice of egg and poultry production. Among these are the welfare of the laying hens and the sanitation of the eggs produced by the large egg producers. Rather than address a problem "after the fact" of possible contamination, I believe that efforts should be spent improving egg producing facilities in order to improve the welfare of the hens and the sanitation of egg production and production facilities.

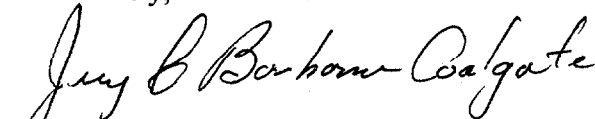
With regard to the irradiation of eggs themselves, we have a great deal of concern that irradiation will change the basic chemistry and therefore nutritional characteristics of eggs. Furthermore, as stated in the Final rule "irradiation of fresh shell eggs at the levels requested in the petition will reduce but not entirely eliminate microorganisms in eggs." If this is indeed the case, improper storage and utilization of eggs can create an environment where microbial populations can increase to dangerous levels. In such cases, irradiation would have served no purpose and would potentially mislead consumers who thought the eggs were "safe" as a result of irradiation.

We also have concerns regarding quality control practices with respect to irradiated egg production. For example, it is unclear as to how FDA and or the USDA will monitor the levels of radiation used, whether the radiation sources are properly managed, and the degree of "treatment" the eggs receive.

Finally, we strongly support the labeling of eggs as having been "irradiated". The public has the right to know how food is manipulated in the food production system in the United States.

Thank you for your time and consideration of this matter.

Sincerely,

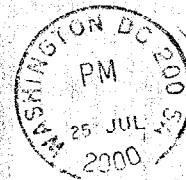


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